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Richland Operations Office
P.O. Box 550
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00-EAP-007

OCT 6 7 1999

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State of Washington
Department of Ecology
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U.S. Environmental Protection Agency
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Addressees:

REQUEST TO REVISE HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT
ORDER (TRI-PARTY AGREEMENT) MILESTONE M-13-23 AND M-13-24 AND
ESTABLISHMENT OF NEW INTERIM MILESTONES TO SUPPORT 200 AREA
OPERABLE UNIT WORK PLANS

Please find enclosed the signed Tri-Party Agreement Class II Change Request Form M-13-99-01
for your review and approval. This package updates the prioritization of assessment activities for
the Operable Units within the 200 Area.

The change request will provide for the application of new criteria to be applied to the
assessment processes to be used within these operable units. The U.S. Department of Energy,
Richland Operations Office and its contractors have worked with your staffs to determine the
most acceptable pathway to implement these changes.

If you have any questions, please contact me on (509) 376-6888 or Brian Foley, Restoration
Projects Division on (509) 376-7087.

Sincerely,

George H. Sanders, Administrator
Hanford Tri-Party Agreement

EAP:JKY

Enclosure

cc: See page 2

Addressees
00-EAP-007

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OCT 07 1999

cc w/encl:

J. R. Wilkinson, CTUIR

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TPA Administrative Record, FDH

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|--|--|--------------------------------|----------|-------------|---|----------|-------------|-----|------|--|--|--|-----|------|--|----------|-------------|---------|------|--|----------|-------------|
| Change Number M-13-99-01 | Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink. | Date October 3, 1999 | | | | | | | | | | | | | | | | | | | | |
| Originator DOE | | Phone | | | | | | | | | | | | | | | | | | | | |
| Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager | | | | | | | | | | | | | | | | | | | | | | |
| Change Title Modification of Interim Milestones M-13-23 and M-13-24 and Establishment of New Interim Milestones to Support 200 Area Operable Unit Work Plans | | | | | | | | | | | | | | | | | | | | | | |
| Description/Justification of Change <u>Introduction:</u> The U. S. Department of Energy (DOE) Environmental Restoration (ER) Program has begun assessing (characterizing and evaluating) contamination at approximately 700 waste sites located in the 200 East and 200 West Areas of the Hanford Site. The sites typically consist of units such as cribs, ponds, ditches, and unplanned releases to soil. They do not include the large underground single-shell tanks (SSTs) and double-shell tanks (DSTs). For purposes of assessment, the sites are grouped into 23 operable units (OUs) based on similarity of waste received and type of waste unit. The DOE ER Program, the Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency worked together to prioritize the assessment of the OUs based on criteria such as potential threats to health and the environment. The initial prioritization is reflected in a series of milestones that were approved in 1998. These milestones establish dates for developing assessment work plans, performing characterization, and evaluating cleanup alternatives. The parties agreed to review the prioritization as work progressed to determine if there were any necessary changes to the criteria and/or ranking process. Preparation of the assessment work plans for the first three OUs began in 1999. In a separate activity, the DOE Office of River Protection (ORP) and Ecology recently concluded negotiations related to interim corrective action at Hanford's SSTs. The 149 SSTs are grouped into waste management areas (WMAs) for purposes of <i>Resource Conservation and Recovery Act</i> (RCRA) groundwater monitoring. Past releases of dangerous waste and dangerous waste constituents from some of the SSTs have resulted in groundwater contamination at four of the WMAs, which has triggered corrective action under RCRA. Several milestones have been established for assessing the contaminant releases at the four WMAs. Under these milestones, a WMA-specific assessment work plan would be submitted for the S-SX WMA in October 1999 (Milestone M-45-52), followed by the B-BX-BY WMA in May 2000 (Milestone M-45-53) and the T and TX-TY WMAs in December 2000 (Milestone M-45-54). One of the issues identified in developing the SST corrective action program and implementing assessment activities is the proximity of several ER Program waste sites to the SST farms. In July 1999, the DOE ER Program, Ecology, and EPA met to reassess OU prioritization needs. Several new criteria were proposed for consideration in establishing OU priorities. These new criteria include the following: <ul style="list-style-type: none"> • Resolution/refinement of the source of existing contaminant plumes (e.g., distinguishing whether the principal contributor to a groundwater contaminant plume is an ER Program crib or the adjacent SST farm) | | | | | | | | | | | | | | | | | | | | | | |
| Impact of Change. Modification of Agreement interim milestones related to preparing work plans and characterizing contamination at the 200-TW-1, 200-TW-2, 200-PW-2, and 200-PW-4 OUs. | | | | | | | | | | | | | | | | | | | | | | |
| Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford site internal planning and budget documents (e.g., Detailed Work Plans). | | | | | | | | | | | | | | | | | | | | | | |
| Approvals <table style="width: 100%; border: none;"> <tr> <td style="width: 40%; border-bottom: 1px solid black;"> for GHS </td> <td style="width: 15%; border-bottom: 1px solid black;"> 10-7-99 </td> <td style="width: 10%; border-bottom: 1px solid black;"> X </td> <td style="width: 15%; border-bottom: 1px solid black;"> Approved </td> <td style="width: 20%; border-bottom: 1px solid black;"> Disapproved </td> </tr> <tr> <td>DOE</td> <td>Date</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"> EPA </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> Approved </td> <td style="border-bottom: 1px solid black;"> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> Ecology </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> Approved </td> <td style="border-bottom: 1px solid black;"> Disapproved </td> </tr> </table> | | | for GHS | 10-7-99 | X | Approved | Disapproved | DOE | Date | | | | EPA | Date | | Approved | Disapproved | Ecology | Date | | Approved | Disapproved |
| for GHS | 10-7-99 | X | Approved | Disapproved | | | | | | | | | | | | | | | | | | |
| DOE | Date | | | | | | | | | | | | | | | | | | | | | |
| EPA | Date | | Approved | Disapproved | | | | | | | | | | | | | | | | | | |
| Ecology | Date | | Approved | Disapproved | | | | | | | | | | | | | | | | | | |

Description/Justification of Change (continued)

- The efficiency gained from integrating data needs and characterization efforts between two DOE programs (e.g., using ER program characterization activities to provide information for development of the System Assessment Capability)
- Technical coordination (e.g., alignment of assessment schedules to produce data of sufficient quality to make sound technical decisions for programs in addition to the ER Program)
- Regulatory integration (e.g., Agreement milestones for a particular program).

Modification of ER Program Schedules

These new criteria were applied to the current OU assessment schedule in light of the recently-developed SST corrective action program and opportunities were identified to coordinate ER Program and ORP activities. There are two OUs that comprise sites that received waste associated with the tank systems, the 200-TW-1 Scavenged Waste Group OU and the 200-TW-2 Tank Waste Group OU. These two OUs contain waste sites that are located near the B-BX-BY WMA and the TX-TY WMA. These two OUs were not scheduled for assessment work plans until after fiscal year 2000 based on the original prioritization scheme. Increasing the priority of these two OUs and advancing the assessment schedule would allow for integration with assessment activities for the SST WMAs. Integration efforts could include conducting joint data quality objective workshops, coordinating sampling activities and analytical requirements, and ensuring that all data are available in a form usable to both programs. Integration would be facilitated by preparing a single work plan to address the 200-TW-1 and 200-TW-2 OUs.

The budget to implement ER Program assessment activities is fixed. Accelerating 200-TW-1 and 200-TW-2 OU assessment activities into fiscal year 2000 requires delaying assessment activities at other OUs. The OUs identified for delay are the 200-PW-2 Uranium-Rich Process Waste Group and the 200-PW-4 General Process Waste Group Operable Units.

To implement this reprioritization, the existing TPA milestones would be changed as follows:

- Interim Milestone M-13-23 (4/30/00) would be reassigned from the Uranium-Rich Process Group (200-PW-2) to 200-TW-1. The milestone date would be changed to 8/31/00.
- Interim Milestone M-13-24 (8/31/00) would be reassigned from the General Process Waste Group (200-PW-4) to 200-TW-2 with no change to the milestone date.
- A new interim milestone would be established to require submittal of the work plan for 200-PW-2 OU by 12/31/00. Submitting the work plan required by this new interim milestone would satisfy major milestone M-13-00K, which requires submittal of one 200 Area work plan by 12/31/00.
- A new interim milestone would be established to require submittal of the work plan for 200-PW-4 OU by 6/30/01. Submitting the work plan required by this new milestone would satisfy in part major milestone M-13-00L, which requires submittal of an additional three 200 Area work plans by 12/31/01.

The slip of four months associated with Milestone M-13-23 is recommended to integrate the 200-TW-1 and 200-TW-2 OUs and is offset by submitting the 200 PW-4 work plan by 6/30/01, six months earlier than would otherwise be required.

The waste sites in the 200-PW-2 and 200-PW-4 OUs include RCRA treatment, storage, and disposal (TSD) units. In accordance with the 200 Area waste site remediation strategy, the RCRA closure plans/postclosure plans for the TSD units will be submitted in conjunction with the OU assessment documentation. Separate Agreement milestones address submittal of the closure plans/postclosure plans as follows:

- Milestone M-20-33, Submit 216-A-10 & 216-A-36B Crib Closure/Postclosure Plans to Ecology in coordination with 200-PW-2 (10/31/03)
- Milestone M-20-52, Submit 216-A-37-1 Crib Closure/Postclosure Plan to Ecology in coordination with 200-PW-4 (12/31/03)
- M-20-53, Submit 207-A Retention Basin Closure/Postclosure Plans to Ecology in coordination with 200-PW-4 (12/31/03).

These closure plan/postclosure plan milestones will not be affected by the delay in the 200-PW-2 and 200-PW-4 assessment work plan milestones. The draft 200-PW-2 and 200-PW-4 Operable Unit Feasibility Study Reports for these units with the RCRA TSD closure plans/postclosure plans will still be completed before the M-20 milestones above.

Description/Justification of Change (continued)

One challenge will be ensuring that changes in the ORP schedules do not adversely impact the ER Program schedules. This will be accomplished through close and continuous communication and by budgeting the ER Program activities at a level that ensures that the ER activities can proceed independently in the event that ORP schedules are delayed.

The new criteria are also being evaluated with consideration to the Groundwater/Vadose Zone (GW/VZ) Integration Project. At this time, no necessary modification of the OU schedule has been identified to support the GW/VZ Integration Project. However, DOE is committed to coordinating the ER Program and the GW/VZ integration Project to identify data needs, particularly in the areas of science and technology, development of waste inventories and contaminant distribution models, development of the System Assessment Capability models, and refinement of groundwater monitoring. DOE will actively seek opportunities to satisfy those needs through ER Program assessment activities.

Interim Milestones Modified/Established by Approval of This Change Request

Modifications to existing milestones

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|---------|----------------------------|-----------|
| M-13-23 | Submit 200-TW-1 work plan. | 8/31/2000 |
| M-13-24 | Submit 200-TW-2 work plan. | 8/31/2000 |

New milestones

| | | |
|---------|--|------------|
| M-13-25 | Submit uranium rich process waste group (200-PW-2) work plan. | 12/31/2000 |
| | Submitting this work plan will satisfy major milestone M-13-00K, which requires submittal of one 200 Area work plan by 12/31/00. | |
| M-13-26 | Submit general process waste group (200-PW-4) work plan. | 6/30/2001 |
| | Submitting this work plan will satisfy in part major milestone M-13-00L, which requires submittal three 200 Area work plans by 12/31/01. | |